



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 22, 2022

VIA ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *B.S. v. Joyce, et al.*, No. 22 Civ. 9738 (PKC)

Dear Judge Castel:

This Office represents the government in the above-referenced habeas corpus action brought pursuant to 28 U.S.C. § 2241. The government will file its response to the habeas petition on December 22, 2022. I write respectfully, at petitioner's request and pursuant to Rule 5.B of Your Honor's Individual Practices, to seek permission to file one exhibit to the government's return to the habeas petition under seal. Consistent with Your Honor's Individual Practices, that exhibit, Government Return Exhibit 9, will be filed under seal on ECF and electronically related to this letter motion.

Petitioner has requested sealing in its entirety Government Return Exhibit 9, which contains the immigration judge's November 18, 2022, written decision on the merits of petitioner's application for relief from removal, on the ground that the immigration judge's decision includes a discussion of sensitive details concerning petitioner's claim for relief from removal. Petitioner plans to file a letter setting forth his position in greater detail. The government takes no position on the request to seal.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Respondents

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cc: Counsel of Record (via ECF)

*Application
GRANTED
ORDERED
S. 8
VSDJ
12-22-22*